

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

**JEKYLL ISLAND-STATE PARK
AUTHORITY,**

Plaintiff,

v.

POLYGROUP MACAU LIMITED,

Defendant.

Civil Action No.: 2:21-cv-8-LGW-BWC

**CONSENT MOTION FOR LEAVE
FOR PLAINTIFF TO FILE EXHIBITS BY ALTERNATIVE MEANS**

Plaintiff Jekyll Island-State Park Authority hereby moves for permission to file exhibits to Plaintiff's Opposition to Defendant's Motion to Dismiss for Lack of Personal Jurisdiction, or in the Alternative to Partially Dismiss for Failure to State a Claim, or, in the Alternative, Plaintiff's Motion to Extend Time to Respond to Defendant's Motion to Dismiss and Plaintiff's Motion for Limited Discovery ("Opposition") (Dkt. 17) by an alternative means. Defendant's counsel will not oppose this motion.

On August 17, 2021, Plaintiff repeatedly attempted to upload the Opposition's supporting exhibits onto the Court's CM/ECF system, but the system would not accept them. As such, Plaintiff filed the Opposition without the exhibits. Plaintiff immediately emailed opposing counsel, explaining the challenge, and attaching a copy of the as-filed Opposition with the unfiled exhibits. There are four unfiled exhibits: Exhibit 1, Declaration of Katrina M. Quicker; Exhibit 2, Declaration of Melissa R. Cruthirds; Exhibit 3: Declaration of Raquel M. Gayle; and Exhibit 4: Declaration of Kathryn A. Vance. Each declaration includes attachments.

The next morning, Plaintiff's counsel called the Clerk who advised that even though each individual exhibit was below the maximum size threshold, the system likely rejected the exhibits because they included multiple color images. The Clerk recommended seeking leave to have the Court receive the exhibits by email.

WHEREFORE, Plaintiff respectfully requests that its Motion to File Exhibits by Alternative Means be granted, and that Plaintiff be permitted to email a copy of the exhibits and attachments to the Court for inclusion into the record.

Dated: August 18, 2021

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*Attorneys for Plaintiff Jekyll Island State-Park
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CERTIFICATE OF SERVICE

Counsel for Plaintiff Jekyll Island-Park Authority hereby certifies that on August 18, 2021, the foregoing CONSENT MOTION FOR LEAVE FOR PLAINTIFF TO FILE EXHIBITS BY ALTERNATIVE MEANS was filed electronically with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filings to all attorneys of record.

/s/Katrina M. Quicker
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